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June 26, 2012

Christopher Morse
Senior Campaign Finance Analyst
Federal Election Commission
999 E Street NW
Washington D.C. 20463

Re:Committee ID C00309567
Your May 24, 2012 request for information

Dear Mr. Morse:

This is to provide additional information, as requested in your letter, regarding amended reports filed by the Committee. We address first the issue of disbursements, which is the largest type of correction in the cited amendments, and then the categories of receipts and debts. Analysis Tables are being sent under separate cover in accordance with your instruction.

Disbursements ? Petty Cash:

As we disclosed in our letter of October 14, 2011, our internal audit found errors in the booking of disbursements. The majority of those errors resulted from the Committee?s initial petty cash management procedures.

Petty cash funds were maintained in a number of cities where the Committee was active in order to cover field organizing activities (mainly public transport and automobile gas reimbursements and office supplies). The original procedure for booking and reporting petty cash activity was to record replenishments of those funds as internal transfers between cash accounts (from bank to petty cash fund) and to record each disbursement out of funds as a separate expenditure. Data for this second step was provided to the Committee?s central bookkeeping staff in the form of raw purchase receipts and disbursement logs.

Some of the fund administrators did not submit their receipts and logs in a timely fashion and the Committee did not have adequate mechanisms in place for monitoring balances and detecting anomalies?e.g., a book balance in excess of the auditable cash remaining. The expenditure by expenditure approach to bookkeeping also meant that central bookkeeping staff time was consumed in recording raw receipts rather than auditing the petty cash funds themselves. When logs and vendor receipts were subsequently obtained and the data input, the additional disbursements were booked and the Committees?
